

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA

v.

ADNREW KASNETZ

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CASE NO. 3:18-CR-345-L

**DEFENDANT’S MOTION FOR AN EXTENSION OF TIME
FROM OCTOBER 22, 2021 TO FILE PRETRIAL MOTIONS AND BRIEF**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE SAM LINDSAY:

COMES NOW, Andrew Kasnetz, Defendant, by and through his undersigned counsel, and hereby moves this Court to grant him an order extending the time to file pretrial motions and brief, and in support thereof would show as follows.

I.

SUM AND SUBSTANCE OF THIS MOTION

The Defendant is still seeking vital discovery from the Government regarding (1) the method(s) the Government used in obtaining the allegedly illegal images and videos, and (2) the accuracy of the language sworn to in the Affidavit for a Search Warrant. As the defense finds more about the search and seizure methodology done in this case, and the information is shown to be relevant to the defense, defense counsel will seek additional discovery. The Defendant and counsel are aware of the present October 22, 2021 deadline for motions to suppress, the December 3, 2021 other deadline for pretrial motions, and the April 11, 2021 trial setting. Defendant and counsel are diligently working to keep to the Court’s schedule in order to try this case on time. Accordingly, Defendant moves the Court to extend the time to file pretrial motions, including

motions to suppress, compel and other discovery motions and brief them and, potentially, to conduct a *Franks* hearing from October 22, 2021 to a time closer to trial.

II.

PROCEDURAL AND FACTUAL BACKGROUND

This is a complex case, involving computer internet and other search issues, allegations of the receipt and possession of child pornography, having been investigated by many different arms of both state and federal law enforcement, and featuring voluminous production. Prior to the undersigned counsel Jeffrey T. Hall (“Hall”) appearing in this case, Kasnetz had been represented by several attorneys at turn-- all of whom have been permitted to withdraw from representing him, despite Kasnetz’s various objections. Unfortunately, the change in counsel negatively has affected the steady progress of the case.. Hall undertook the representation of Kasnetz in this case knowing full well the strictures of this Honorable Court as to meeting the Court’s Scheduling Order deadlines, keeping this case on track for its April 11, 2022 Trial setting, and understanding the Court’s other Orders. After diving into the representation, Hall has become more aware of the scope and magnitude of the undertaking. In addition to being a legally complex case, Hall has become aware of hundreds of thousands of pages of produced documents that are not part of the 11 tranches of Government Production that he was aware of before Hall appeared in the case -- undercover investigations logfiles -- all of which must be reviewed, digested, analyzed and organized for motion practice and trial. These matters require a substantial amount of time. Finally, there are continuing discovery and pretrial matters which must be submitted to the Court for rulings. For these reasons, Defendant requests more time.

III.

CONCLUSION

WHEREFORE, PREMISES CONSIDERED, for the reasons and authorities stated in this motion and memorandum, Defendant Andrew Kasnetz respectfully moves this Court for the entry of an order extending the time to file pretrial motions and briefs as requested hereinabove in this cause.

Respectfully submitted:

By: /s/ Jeffrey T. Hall
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**ATTORNEY FOR DEFENDANT
ANDREW BLAIR KASNETZ**

CERTIFICATE OF CONFERENCE

The undersigned counsel for Defendant hereby certifies that a conference was had regarding the relief requested in this Motion on October 22, 2021, with Abe McGlothin, Assistant United States Attorney, and Mr. McGlothin advised that he opposed the Motion.

Certified, October 22, 2021.

/s/ Jeffrey T. Hall
Jeffrey T. Hall

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that a copy of the foregoing document was served by filing electronically, utilizing the CM/ECF system currently in operation by this Court, which CM/ECF system will automatically notify the assigned prosecutor at the United States Attorney's Office for the Northern District of Texas. The electronic case filing system will send a Notice of Electronic Filing to opposing counsel of record. Accordingly, this document was served, under the Federal Rules of Criminal Procedure, upon all parties or their counsel of record on October 22, 2021.

/s/ Jeffrey T. Hall
Jeffrey T. Hall